

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	
	)	

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**CERTIFICATION ON BEHALF OF THE DETROIT RETIREMENT  
SYSTEMS PURSUANT TO ORDER GRANTING MOTION TO COMPEL  
FULL CLAWBACK OF DEBTOR’S DOCUMENT PRODUCTION  
AND RELATED RELIEF**

I, Andrew M. Mast, hereby certify as follows.

1. I am an attorney with the law firm of Clark Hill, PLC (“Clark Hill”), counsel for the General Retirement System of the City of Detroit and the Police and Fire Retirement System of the City of Detroit (the “Retirement Systems”), creditors and/or interested parties in this matter.

2. I make this certification pursuant to the Court’s Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief, entered on May 13, 2014 [Dkt. No. 4710] (the “Clawback Order”).

3. On May 7, 2014, Robert D. Gordon, of Clark Hill, received a hard drive with documents produced by the debtor, City of Detroit, Michigan (the “Production”). The Production was thereafter processed and uploaded by Clark Hill’s third-party vendor.

4. On May 13, 2014, I caused:

- a. All electronic copies of the Production or portions thereof to be purged from Clark Hill's computer system;
- b. Clark Hill's third-party vendor to deny Clark Hill personnel access to the Production documents;
- c. All physical copies of the Production or any portions thereof to be destroyed; and
- d. All work-product reflecting the contents of any document in the Production to be destroyed except for lists of Bates numbers from the Production with corresponding subject or issue codes that Clark Hill has created based on the Production.

5. On May 14, 2014, I caused the Production to be sent by overnight courier to the City's Counsel, Jones Day, at 51 Louisiana Avenue, N.W., Washington, DC 20001, Attn: Mary Hale.

6. On May 14, 2014, Clark Hill instructed its third-party vendor to purge all electronic copies of the Production or portions thereof from its system, except for the work product referenced in paragraph 4(d), above. I understand that Clark Hill's third-party vendor will have completed the process of purging the Production from its systems by the end of the day on May 14, 2014.

7. Clark Hill has therefore complied with each of the provisions of paragraph 2 of the Order.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2014

By: /s/ Andrew M. Mast  
Andrew M. Mast

Respectfully submitted,

CLARK HILL PLC

/s/ Shannon L. Deeby  
Robert D. Gordon (P48627)  
Shannon L. Deeby (P60242)  
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Dated: May 14, 2014

*Counsel to the Police and Fire Retirement  
System of the City of Detroit and the General  
Retirement System of the City of Detroit*